IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Norfolk Division

DAVID I. GLOVER,

Plaintiffs,

v.

Case No. 2:17-cv-00109

THE CITY OF NORFOLK, VIRGINIA, and RICHARD J. HRYNIEWICH,

Defendants.

TIMOTHY B. PRIDEMORE,

Plaintiffs,

v.

Case No. 2:17-cv-00110

THE CITY OF NORFOLK, VIRGINIA, and RICHARD J. HRYNIEWICH,

Defendants.

SAFE BOATS INTERNATIONAL, LLC'S MOTION TO BIFURCATE

Third-Party Defendant Safe Boats International, LLC ("Safe Boats"), by counsel, hereby moves the Court, pursuant to Rule 42(b) of the Federal Rules of Civil Procedure and the Court's inherent authority to stay proceedings, for entry of an order bifurcating claims filed by Third-Party Plaintiff The City of Norfolk, Virginia (the "City") against Safe Boats, and staying the case against Safe Boats until the City's liability to Plaintiffs David I. Glover and Timothy B. Pridemore is determined.

In support of this motion, Safe Boats relies on the memorandum submitted contemporaneously herewith in accordance with Local Civil Rule 7(F).

WHEREFORE, Safe Boats respectfully requests the Court enter an Order bifurcating the City's claims and granting such other and further relief as the Court deems just and proper.

Dated: November 9, 2022 SAFE BOATS INTERNATIONAL, LLC

/s/ James L. Chapman, IV

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Attorneys for SAFE Boats International, LLC

CERTIFICATE OF SERVICE

I hereby certify that on November 9, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ James L. Chapman, IV

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